

EXHIBIT 19

From: John Macron <johnjmacron@gmail.com>
Sent: Monday, March 4, 2024 5:01 PM
To: Adam Perlin
Cc: Mark Macron
Subject: Ideal v Rusi

[EXTERNAL SENDER]

Greetings,

As I stated to you on the phone (slightly amended in your follow-up email), I am trying to come up with a plan for a proposed resolution of this case. I am also trying to obtain documentation which substantiates debtors position.

I should be in receipt of some additional documentation (records / books) relating to the debtor's financial condition prior to the filing. I will review the same, and if appropriate forward to you.

I will also be filing the rule 26 disclosures, in the adversary proceedings.

Can we plan to talk on Wednesday afternoon or Thursday morning? You should have our additional documentation by then.

Thanks,

John Macron

John J. Macron
Attorney & Counselor at Law
491 Bard Avenue
Staten Island, NY 10310
718-889-3583

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On Thu, Feb 29, 2024 at 2:18 PM Adam Perlin <aperlin@kaufmandolowich.com> wrote:

John,

As per our discussion two weeks ago and my email below, your client was to provide me with documents no later than February 27, 2024. It is now past that deadline and I have received no documents from you. Moreover, you advised that you were going to provide me with a potential settlement offer, which I also did not receive from you.

Please advise on the status of your client's documents. I would prefer not to make a motion but you are leaving me with little choice.

Adam

Adam Perlin
Attorney at Law

We have changed our email addresses to @KaufmanDolowich.com.
Please update your files with our new contact information. We will continue to receive emails sent to kdvlaw.com for a period of time.

KAUFMAN

[135 Crossways Park Drive, Suite 201](#)
[Woodbury, NY 11797](#)

Direct: 516-283-8749
Cell: 917-873-0045
Email: aperlin@kaufmandolowich.com

Mansfield Rule

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From: Adam Perlin <aperlin@kaufmandolowich.com>
Sent: Tuesday, February 13, 2024 10:19 AM
To: John Macron <johnjmacron@gmail.com>
Cc: Mark Macron <mark@macronesq.com>
Subject: RE: Ideal v Rusi

John,

As discussed, we agree to a further 14-day extension of time to February 27, 2024 for your client to produce the documents demanded by Ideal Supply's document request dated December 11, 2023. This represents our further good faith effort to resolve this issue without motion practice.

Thank you,

Adam

Adam Perlin
Attorney at Law

We have changed our email addresses to @KaufmanDolowich.com.
Please update your files with our new contact information. We will continue
to receive emails sent to kdvlaw.com for a period of time.

KAUFMAN

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Please consider the environment before printing.

From: John Macron <johnjmacron@gmail.com>
Sent: Saturday, February 10, 2024 6:47 PM
To: Adam Perlin <aperlin@kaufmandolowich.com>
Cc: Mark Macron <mark@macronesq.com>
Subject: Re: Ideal v Rusi

[EXTERNAL SENDER]

Adam:

Please accept this email in partial response to your letter via email of February 1, 2024. I annex further documents regarding this matter, including tax returns for Fahrenheit and for the Debtor.

While I do not necessarily dispute there may be shortcomings in the production of documents thus far, I do dispute the causes or the reasons, inferred or propounded by you, as well as the conclusions you may be seeking to have the Court reach.

To the extent, the complete production has not been made, it is not because the documents were not kept, but rather they cannot presently be located. In order to understand the situation, please understand the following:

1. Debtor was experienced in business, and in running a construction business;
2. Debtor employed a chief financial officer for Fahrenheit, a person he had known for about 15 years, and who had worked with debtor in a prior companies;
3. The chief financial officer for Fahrenheit did maintain books and records of Fahrenheit, and did so in accordance with the lien law; and,
4. Some personal difficulties, faced by Debtor, resulted in Fahrenheit, ceasing business operations.

This is not to say that Fahrenheit simply stopped operating, it did wind down.

I would like to set up a time to discuss the situation with you prior to your seeking preclusion or my seeking a protective order. I am available at any point Tuesday, Wednesday in the afternoon, or Thursday in the afternoon.

Please let me know.

Thanks,

John Macron

On Thu, Feb 1, 2024 at 4:25 PM Adam Perlin <aperlin@kaufmandolowich.com> wrote:

John,

Please see the attached correspondence.

Thank you,

Adam

Adam Perlin
Attorney at Law

We have changed our email addresses to @KaufmanDolowich.com.
Please update your files with our new contact information. We will continue to receive emails sent to kdvlaw.com for a period of time.

KAUFMA

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Please consider the environment before printing.

From: John Macron <johnjmacron@gmail.com>
Sent: Tuesday, January 30, 2024 9:31 AM
To: Adam Perlin <aperlin@kaufmandolowich.com>
Cc: Mark Macron <mark@macronesq.com>
Subject: Ideal v Rusi

[EXTERNAL SENDER]

Greetings,

These are documents (487 pages, Bates Stamped) regarding this matter we have assembled. I believe you may have received some of these already.

Also, I am trying to locate any additional information from Fahrenheit for the response to Demand for the Verified Statement.

Thanks,

John J. Macron
Attorney & Counselor at Law
[491 Bard Avenue](#)
[Staten Island, NY 10310](#)
718-889-3583

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John J. Macron

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